

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

## **INTERVENOR WILLIAM SCOTT'S WITNESS LIST**

Intervenor William Scott (“Scott”) files this witness list for any hearing or trial the Court may hold on Defendants’ Motion to Terminate Consent Decree. Scott may call the following witnesses:

1. William Scott  
c/o Deborah C. Milner  
Vinson & Elkins LLP  
1001 Fannin Street, Suite 2500  
Houston, Texas 77002
2. John Wesley Chisum, TDCJ # 00583411  
Huntsville Unit, Texas Department of Criminal Justice
3. Michael A. Krause  
No current address
4. Timothy Barnett, TDCJ # 01826708  
Ramsey I Unit, Texas Department of Criminal Justice

5. Larry Hart  
Chaplain Texas Department of Criminal Justice  
c/o Celamaine Cunniff, Assistant Attorney General  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711
6. Bill Pierce  
c/o Celamaine Cunniff, Assistant Attorney General  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711
7. Brad Livingston  
c/o Celamaine Cunniff, Assistant Attorney General  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711
7. Any witness listed on any other party's witness list

Scott reserves the right to amend this witness list.

Respectfully submitted,

/s/ Deborah C. Milner  
Deborah C. Milner  
State Bar No. 24065761  
S.D. Tex. No. 971677  
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1001 Fannin Street, Suite 2500  
Houston, TX 77002-6760  
Tel: 713.758.2381  
Fax: 713.615.5040  
Email: cmilner@velaw.com

*Attorney for Intervenor William Ernest Scott*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of September, 2013, I electronically filed the foregoing with the Clerk of the Court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the Court pursuant to Local Rule CV-5.1.

In addition, I served the following parties by first-class mail:

Harvey Dale Angel, TDCJ #638529  
The Walls Unit  
815 12th Street  
Huntsville, Texas 77348

Michael Hosea, TDCJ #711435  
Polunshy Unity  
3872 FM 350 South  
Livingston, TX 77351

/s/ Deborah C. Milner  
Deborah C. Milner